

## **Narrative Proposal**

### **Threshold Criteria for Assessment Grants**

#### **1. Applicant Eligibility**

Rockford is a municipal corporation formed by the authority of the State of Illinois. Rockford is eligible to apply for assessment grants from the USEPA.

#### **2. Letter from the State or Tribal Environmental Authority**

The Letter from the Illinois Environmental Protection Agency is attached as Attachment A.

#### **3. Site Eligibility and Property Ownership Eligibility**

Not Applicable. This is a community-wide application; therefore, no specific sites have been identified. Nine (9) Targeted Brownfield Areas, referred to as “Targeted Brownfield Clusters” are proposed to be the focus of this Assessment Grant.

### **Ranking Criteria for Assessment Grants**

#### **1. Community Need**

The City of Rockford, Illinois, was once a thriving manufacturing community, but has since faced decades of economic decline. Rockford was designated by the State of Illinois as an Enterprise Community in 1989; a designation based on poverty, unemployment, and economic growth factors. Prior to 2006, the City had created fourteen (14) Tax Increment Finance (TIF) districts in recognition of the area’s continuing physical distress and economic decline. From the beginning of 2006 through October of 2009 an additional 16 TIF Districts were created, bringing the City’s total to 30. During 2003, The Global Trade Park Industrial Recovery Redevelopment Planning Area was created under the authority of Illinois law. Rockford qualified for this special redevelopment planning area designation because of unemployment above the state average. During 2005, the Harrison/Kishwaukee Redevelopment Planning Area was created in an area especially burdened with abandoned industrial properties. During 2007 the City of Rockford was designated as a River Edge Zone Community, one of only three designated by the State of Illinois. In the process of preparing an extensive application for this designation, the City of Rockford quantified the extent of Brownfields located within the River Edge Zone: 665 Acres on 371 parcels all within approximately 1500 feet of the Rock River.

Although this is a community-wide grant application, this Brownfield effort is targeted for 9 Targeted Brownfield Clusters located in two geographic areas of the City. The first is the “West side” of Rockford which includes 8 Census Tracts and 6 of the 9 Targeted Brownfield Clusters. Within the West Side is economically distressed area west of the Rock River and South of Auburn Street as well as a major portion of Downtown. Within the West Side, emphasis will be on Riverfront areas in and near the Downtown area, along major transportation corridors such as South Main Street, West State Street, and Auburn Street and deteriorated industrial areas in and near rail yards and rail lines to the south and west of Downtown.

The second geographic area is the “near East and Southeast side” of Rockford. The near East and Southeast side is a smaller area that includes 5 Census Tracts and three (3) of the Brownfield Clusters, two near Downtown on the east bank of the Rock River and the third being the north south rail corridor that parallels the Rock River on the southeast side. Together the two geographic areas will be combined and referred to as the Community Wide (CW) Targeted Brownfield Community consisting of 13 Census Tracts: 8, 10,11,12,13 and 25 through 32.

**a. Health, Welfare and Environment:** Each of the nine Targeted Brownfield Clusters has a severe impact on the adjacent neighborhoods, together comprising the 13 Census Tracts of the CW Targeted Community. Once thriving areas with workers and nearby retail areas serving these workers, these Brownfield Clusters now contribute to crime and deterioration of the surrounding neighborhoods and form physical barriers to normal social interaction. In many ways, Brownfield Clusters such as the South Main Street /Water Power District Area form physical and psychological barriers. In this case this Brownfield Cluster forms a barrier between Downtown to the north and the residential neighborhoods to the south and west. Over time this area and surrounding neighborhoods have experienced a major decline in population and increasing levels of poverty and crime.

The CW Targeted Community has a total population of 38,321 and accounts for a little over one-fourth of the City’s population, 25.5% of the 150,115 Rockford population figure. The CW Targeted Community has a minority population of 53.4% ( 31.6% City as a whole), an African American population of 35.0% ( 17.2% City as a whole), a Hispanic or Latino population of 18.4% (10.5% City as a whole), and a persons living below the poverty level of 28.9%, ( only 14% City as a whole). Nearly one fourth of all the families, 24.6%, are living below the poverty level (10.5% City as a whole). Median household income is roughly two-thirds of that of the City as a whole, \$24,173 compared to \$37,667.

In the CW Targeted Community 21 % of the households are single parent families compared to only 14% in the City as a whole and 9.7% of the households have public assistance income compared to 4.5% in the City as a whole. There is also a concentration of Children in the CW Targeted Community, with an 18.4% figure (15.28% City) for children under 10 and 31.47% (26.66% City) for children under 18. The CW Targeted Community is also a predominantly renter-occupied area, with owner-occupied units accounting for only 37.5% of the occupied units compared to 61.1% in the City as a whole. The housing stock has a median year built of 1944 compared to 1958 for the City as a whole and 12.8% of the housing units were vacant in 2000 compared to 6.9 % in the City as a whole. These demographics clearly demonstrate the concentration of economically disadvantaged populations along with numerous indicators of distressed neighborhoods in the West and Southwest Subarea. (US Census 2000).

Winnebago County Health Department Statistics for blood lead testing in children are available for a two year period, (8-1-07to 8-31-09). This data was gathered by Zip Codes and not available at the Census Tract level. This data shows higher incidences of elevated lead levels in the bloodstream for the US Postal Zip Codes that include the CW Targeted Community. Zip Codes 61101, 61102, 61103 and 61104 include the entire CW Targeted Community and showed 237 children or 4.5% of the 5,270 children initially tested had lead levels at 10 or more micrograms per deciliter. Of the 888 children who were later retested, 127 or 14.3% still had elevated lead levels in their bloodstreams. The County wide figures show that 290 of the 10,157 initially tested (2.9%) had high lead levels. If the four zip codes that include the CW Targeted Community are not included, the entire County

excluding these four zip codes has an incidence in the initial test of only 1.1%, 53 out of 4887 tested. The figures are similar for the retest 3.5% or 21 of 598 in the County excluding these four zip codes.

The high incidence of elevated lead levels among the children of this four Zip Code area that includes the entire CW Targeted Community, coupled with the socioeconomic and housing data clearly show that the CW Targeted Community is an area with an older housing stock where lead-based paint has not been abated and, instead, the housing stock is deteriorating due to disinvestment by the property owners. This disinvestment results in a high rate of elevated lead levels in the children and the related health issues within the CW Targeted Community. This disinvestment is symptomatic of an area impacted by Brownfields.

It is not surprising that this subarea is also experiencing high crime rates according to the Rockford Police Department Statistics. Based on the population, average crime rates should be 25.5% in the CW Targeted Community. Instead, crime rates for crimes against persons are almost double the expected rate. Among the crimes against property/society, drug/narcotics violations and weapon law violations are more than double the expected rate.

	City	Targeted Community	% of City
Population	150,115	38,321	25.5
Crimes against Persons	7,566	3,302	43.6
<i>Murder</i>	23	12	52.2
<i>Forcible Rape</i>	140	64	45.7
<i>Robbery</i>	618	298	48.2
<i>Aggravated Assault</i>	1,116	557	49.9
Crimes against Property/Society	20,173	6,618	32.8
<i>Burglary</i>	2,779	943	33.9
<i>Motor Vehicle Theft</i>	828	313	37.8
<i>Destruction/Vandalism</i>	6,743	2,310	34.3
<i>Drug/Narcotics Violations</i>	1,086	656	60.4
Weapon Law Violations	552	305	55.3
All Group A Offenses	27,739	9,920	35.8
Group B Offenses	17,637	5,433	30.8
<i>Curfew/Loitering/Vagrancy</i>	427	197	46.1
<i>Runaway</i>	954	394	41.3

The Crime statistics from the above Table clearly show a high incidence of violent crimes against persons, considerable levels of crime against property, considerable illegal drug activity, weapons law violations and societal issues all taking place within the CW Targeted Community. The presence of numerous Brownfield sites clearly contributes to this criminal activity because they are places that are removed from the eyes of community residents where illegal activities and serious crimes can take place.

**b. Financial Need**

i) **Economic Impact of Brownfields:** The 2000 Census reported unemployment in the City of Rockford at 4.7%. Average unemployment for 2005 was estimated at 8.1% for the entire City, but was 14.5% in the CW Targeted Community. Three of the 13 Census Tracts were over 20% unemployment for 2005. Currently, August of 2009, the unemployment rate is 16.9% for the City as whole and probably close to double that figure in the CW Targeted Community. (Illinois Monthly Labor Force Report, Illinois Department of Employment Security). The current unemployment levels are severe for the City of Rockford and the surrounding area as evidenced by the 15.1 % figure for the Metropolitan Statistical area, making the Rockford area the 15<sup>th</sup> worst in the nation in unemployment out of 372 Metropolitan areas. (U.S. Department of Labor, Bureau of Labor Statistics). Though no official estimates for subareas are available, there is no question that unemployment is much worse in the CW Targeted Community, possibly as high as 35%. This is one of many reasons why the assessment, cleanup and redevelopment of the Brownfields are so important to the impacted CW Targeted Community.

2000 Census data also reveals that 22% of the City's population 18 and over never finished high school, while, in the CW Targeted Community the figure was 38.4 %. Median income levels are \$24,173 considerably lower than the City-wide median of \$37,667. (US Census 2000, except as noted) Other economic indicators show poverty and economic distress at two times or higher than the levels for the City as a whole. These indicators include:

- a) Persons living below the poverty level – 28.9% compared to only 14% for the City as a whole;
- b) Families living below the poverty level – 24.6% compared to 10.5% for the City as a whole;
- c) Households that are single parent families – 21.0 % compared to 14% for the City and
- d) Households that have public assistance income – 9.7% compared to 4.5% for the City.

It is no coincidence that the CW Targeted Community demonstrates such high levels of economic need. The combination of the concentration of Brownfields, lack of basic retail and other services, the aging housing stock, high incidence of crime and general lack of investment by the private sector have resulted in a precipitous decline in the viability of these neighborhoods. This trend will continue unless these Brownfields are assessed, cleaned and redeveloped. The Assessment Grant Program proposed in this application would be a major step in the redevelopment of the Brownfield areas to productive uses including providing retail goods and services, residences, park and open spaces and offices.

**Funding and resource limitations:** Although the City of Rockford has received four (4) USEPA Brownfield Assessment Grants, the first three Grants , FY 2001, FY2004, and FY 2006 have been completely exhausted and closed out. The FY 2008 Assessment Grant is now 98% completed and 100% committed with the last of these funds being used for the Phase I Assessment of the Tapco building. The FY 2008 Assessment Grant will be closed out before the end of November, 2009. Although the assessment work will have been completed at the Barber Colman site and the Ingersoll site by that time, these two sites only account for 20 acres of the 665 Brownfield Acres in the River Edge Zone, only a portion of the City. Some progress has been made at other targeted Brownfield sites, such as the West State Street Corridor where approximately 20% of the 47 Brownfield sites have had Phase I ESAs or Phase II ESAs performed and the Downtown where approximately 10% of the Brownfield sites have had Phase I or Phase II ESA performed. Other than eligibility determinations, however, the other

Targeted Brownfield areas have had very limited environmental assessment work performed due to the exhaustion of the Assessment Grants.

The River Edge program of the State of Illinois provides Assessment and Cleanup funds to the City for City-owned Brownfields but only if the City is able to enter into an Agreement with a Developer to redevelop the site and only after the State of Illinois has sold its Capital Development Bonds. The City has found very limited interest by Developers in these Brownfield sites unless they have already been Assessed and Cleaned, thus placing the financial burden on the City and the USEPA Assessment Grant Program.

## 2. Project Description and Feasibility of Success, including Anticipated Outputs and Outcomes

a. **Project Description.** The City of Rockford proposes to perform Phase I Environmental Site Assessments at a minimum of 20 Brownfield Sites with approximately half being petroleum sites. These Phase I ESAs will be performed as a pre-requisite to City of Rockford acquisition of Brownfield sites within the following 9 Targeted Brownfield **Clusters**: West State Street Corridor, Auburn Street Corridor; Southeast Rail Corridor; Downtown; Barber Colman Village (North of Loomis Street); North Main Street Museum Campus area; South Main Street/Water Power District Corridor; North Madison Street Riverfront Corridor, and the Ingersoll/ Watch Factory Riverfront area. Each of these Brownfield Clusters falls within one of two geographic areas, the West Side (containing 8 Census Tracts) or the Near East and Southeast side containing 5 Census Tracts. Many of these Targeted Brownfield Clusters have had a Desktop Phase I performed, site prioritization determined, or an eligibility determination matrix prepared and approved. Some of the Targeted Areas that have been included in earlier Brownfields Grants have also had some Phase I ESAs performed. As a result of these initial assessment activities, conducting the Phase Is will not require extensive preliminary work in most cases. Phase II Environmental Site Assessments will be performed at a minimum of 8 sites with at least 5 sites being Petroleum Sites and at least 3 sites being hazardous substance sites. At least 3 sites will be selected for Cleanup and Redevelopment. The Cleanup Planning Reports will be prepared and these sites will be enrolled in the Illinois EPA Site Remediation Program.

**Comment [j1]:** Need to reiterate two geographic area that these 9 clusters fall so reviewer does not get confused.

The following is a description of the current status of each of these Targeted Brownfield Areas, anticipated outputs from this proposed Assessment Grant and at the proposed future outcome:

**West State Street Corridor:** The West State Corridor Study was approved by the City of Rockford in the fall of 2002 and incorporated into the City's Comprehensive Plan, the 2020 Plan in September of 2004. A major component of this Study was the creation of retail nodes, preserving existing cultural and human service nodes such as the Crusader Clinic Campus and Church properties, and providing a linear pathway and parkway on one side of the street in conjunction with the reconstruction of the roadway. An Environmental Assessment Desktop Review prepared in February of 2007, identified 47 sites with environmental concerns within the three mile segment of this corridor from Kilburn Avenue west to Springfield Avenue. Since that time, a total of eight Phase I ESAs were performed and one Phase II ESA was performed. Following these efforts, four vacant and deteriorated commercial structures were demolished. The intent of this proposal is to perform five to seven additional Phase I ESAs and 2 to 3 Phase II ESAs in this corridor with this proposed Assessment Grant as an additional step in the implementation of the West State Street Corridor Plan.

**Auburn Street Corridor and the South Main Street/ Water Power District:** The City anticipates preparing a Desktop Review and identification of priority sites with the proposed grant within each of these areas because they have not been assessed previously. **The Auburn Street Corridor** has experienced a decline in commercial activity, and there are several former gas station sites and small manufacturing sites that have been abandoned. **The South Main Street/Water Power District** is the oldest industrial area in Rockford, dating back over 175 years. A blighted section of this area fronts on South Main Street and Kent Creek and needs to be addressed because it impacts the nearby Hispanic Commercial area and is an important section of the “Greenway Plan” public pathway system and the Grand Illinois Trail System by linking the Downtown Pathway with the Pecatonica Prairie Path.

**Southeast Rail Corridor:** An eligibility determination matrix has been prepared for the portion of this corridor that fronts on Kishwaukee Street and Harrison Avenue. This corridor includes several vacant manufacturing buildings as well as former gas station sites. The Kishwaukee Corridor Study has been completed, and implementation through the Kishwaukee Empowerment Group, a group of local business owners and other stakeholders, is well underway. In connection with this planning and implementation process, the City has been approached by an industrial property owner wishing to donate a Brownfield site to the City and by other owners asking the City to acquire derelict Brownfield properties that are negatively impacting their business. The City anticipates performing 2 to 3 Phase I ESAs in this corridor and 1 Phase II as a result of these requests. Additional Brownfield priorities will be identified as implementation continues. The anticipated future outcome is the redevelopment of problem Brownfield sites within this corridor and surrounding areas through a combination of the Brownfield Assessment Program, the City’s TIF program and stakeholders in the area.

**Downtown:** The River District’s Framework Plan and Implementation Plan are used to prioritize sites for redevelopment and the strengthening of Downtown’s retail office and residential sectors. There are numerous opportunities to utilize former gas station sites and vacant industrial buildings to develop retail shops, residential lofts and support uses when developers can be secured. The ESA Desktop Review completed in June of 2007 found nearly 100 sites with environmental concerns, and, as a result, site assessments have only been performed when redevelopment or City site acquisition is eminent. Five (5) Phase I ESAs, one of which was a four-block site now occupied by the Winnebago County Justice Center, and one Phase II ESA have been performed in the Downtown area during the past four years using the USEPA funds. Phase I ESAs and Phase II ESAs were performed for a two block area using the IEPA program during 2003 and 2004 for the Federal Courthouse site which is now nearing completion and should be operating during 2010. It is anticipated that 3 to 5 Phase I ESAs and 1 to 2 Phase II ESAs will be performed with this grant in the Downtown area as a result of redevelopment projects. Most of the Downtown is included in a TIF District, increasing the chance of positive outcomes with redevelopment of vacant properties.

**Barber Colman Village (North of Loomis Street);** this is the area immediately north of the City-owned Barber Colman complex, and it is an area with numerous vacant and abandoned industrial buildings on either side of Morgan Street. This area is proposed for redevelopment as commercial and residential with a public riverfront greenway/pathway at the east edge of the site along the Rock River as part of the regional Greenways Plan. The Environmental Assessment Desktop review performed in 2005, however, identified all the properties in this 7 block area as having environmental concerns. Morgan Street crosses the Rock River, and this bridge is scheduled to be replaced by 2012 with the reconstruction of Morgan Street through this area. An Agreement with a developer for a major redevelopment at the Barber Colman plant immediately south is expected to be finalized in the spring of 2010. The City will be preparing a detailed plan for this Targeted area

and anticipates acquiring additional properties for the implementation of the Riverfront Greenway. Two to three Phase I ESAs are anticipated to be needed for this effort.

**North Main Street Museum Campus Area, North Madison Street Riverfront Corridor, and the Ingersoll/Watch Factory Riverfront area:** Eligibility determinations have been prepared for each of these areas, but Phase I and Phase II ESAs have only been performed at the City-owned former Ingersoll site located in the third area. There is considerable redevelopment interest in each of these areas, each of which has been identified for major development as a “Catalytic” development area in the River District Framework Plan. However, the Rockford Watch Factory itself has had numerous interested parties during the past 15 years but no bonafide development proposal due to the environmental uncertainties at this 100 year old structure and site. The other two areas have experienced similar situations, with numerous proposals but no actual redevelopment projects. Three to five Phase I ESAs and two to three Phase II ESAs are anticipated as redevelopment moves forward in at least one of these areas.

**b. Budget for EPA Funding and Leveraging Other Resources**

i) Budgets for EPA Funding

**Assessment Grant Proposal Budget (Hazardous Substances)**

Budget Categories	Task 1:	Task 2: Phase I ESAs	Task 3: Phase II ESAs	Task 4: Cleanup Planning/ Site Remediation Program	Task 5: Community Involvement	Task 6: Program- matic Activities	TOTAL
Personnel							
Travel <sup>1</sup>						\$ 3,000	\$ 3,000
Equipment <sup>2</sup>							
Supplies					\$ 2,000		\$ 2,000
Contractual <sup>3</sup>	\$ 5000	\$35,000	\$100,000	\$ 35,000	\$ 5,000		\$ 180,000
Other: IEPA SRP Fees				\$ 15,000			\$ 15,000
USEPA Grant Total	\$ 5000	\$ 35,000	\$100,000	\$ 50,000	\$ 7,000	\$ 3,000	\$ 200,000
City In-kind Match Total					\$ 10,000	\$ 5,000	\$ 10,000
Project Total	\$ 5,000	\$ 35,000	\$100,000	\$ 50,000	\$ 17,000	\$ 8,000	\$ 215,000

**Task 1: Site Prioritization & Eligibility Determinations**

The City has identified nine Targeted Brownfield Clusters as part of this grant application. A listing of the properties in these areas is easily compiled through the use of Winnebago County’s GIS information that is fully assessable by City staff. Funds are not needed to identify sites. Our intent is to utilize these grant funds to prioritize the sites. The Brownfields Advisory Committee, which has been dormant for a few years, will be reconstituted to include the Alderman representing each of these nine (9) Brownfields Clusters as well as area stakeholders and representative from the neighborhoods. This Committee will provide valuable insight in the prioritization of these sites. Once the sites have been prioritized, the eligibility determination information will be gathered and

submitted to USEPA for review. In the case of commingling of hazardous substances with petroleum, the same eligibility determination information will be submitted to the Illinois EPA.

#### **Task 2: Conduct Phase I Site Assessments – Individual Sites**

Once sites are prioritized, eligibility determinations have been completed and accepted, a Phase I Environmental Site Assessment (ESA) will be conducted. All Phase I ESAs will be prepared in accordance with the ASTM E1527-05 standard, which has been approved by USEPA as demonstrating that All Appropriate Inquiry has been conducted as detailed in the November 1, 2005, 40 CFR 312, Standards and Practices for All Appropriate Inquires, Final Rule, which became effective November 1, 2006. The City anticipates conducting ten (10) to twelve (12) assessments at an average cost of \$3,000 per site.

#### **Task 3: Phase II Environmental Site Assessments**

The City anticipates conducting three (3) to five (5) Phase II ESAs based on the results of the Phase I ESAs. The number of assessments conducted will, in part, depend upon the size of the selected properties and the nature and extent of the contamination involved. The three (3) following items must be completed by our contracted Brownfields consultant prior to commencing with any Phase II ESA activities. First the contracted consultant must prepare and receive approval from EPA of a Quality Assurance Project Plan (QAPP), Health & Safety Plan (HASP), and Sampling and Analysis Plan (SAP). The Phase II ESAs will be compliant with Illinois EPA Site Remediation Program (SRP) standards. The costs of Phase II ESAs vary widely and tend to be more costly at hazardous substance sites than at petroleum only sites. Costs vary due to the size of the site and the contaminants being evaluated. As part of the SRP, many hazardous substance sites are enrolled as a “Comprehensive” site which require analyzing for 122 compounds and results in significant laboratory costs compared to “Focused” sites. Overall Phase II ESA costs can range from \$15,000 to \$65,000 per site. We have found that sites investigated as “Comprehensive”, while expensive, best positions the site for redevelopment.

The sites where contamination is found will then be enrolled into the Illinois EPA SRP. The SRP is a well tested and proven voluntary cleanup program. Our intent would be to prepare the enrollment application and take the results of the Phase II ESA work and present that information in the form of a Work Plan with the application. The Work Plan will detail the additional investigative activities that will be needed to define the lateral and vertical extent of the discovered contamination.

#### **Task 4: Prepare Remedial Action Plans (Cleanup Plans)**

Following the SRP enrollment (budgeted in this task) and the completion of the Site Investigation step as part of the SRP process, Remedial Objectives/Remedial Action Plans (ROR/RAP) will be prepared. We intend to prepare plans for the three (3) to five (5) Phase II ESA properties, based on the amount of funding remaining once we get to this step. This task also includes paying for IEPA project management fees for regulatory review and approval of plans submitted to the IEPA for review under the SRP. The IEPA voluntary cleanup programs are fee-for-service programs. Since all sites for which Phase II ESAs are conducted will be enrolled in the IEPA programs, oversight fees will accumulate beginning with the review of the proposed Phase II Assessment work plan.

#### **Task 5: Community Involvement**

The objective of this task is to inform the community as a whole and the communities in the Brownfields Targeted Areas of: a) the City’s intent to conduct environmental assessment activities; b) community input concerning the priorities for assessment activities and future redevelopment; c) the assessment results; and d) cleanup plans and redevelopment efforts. The City intends to rely primarily upon the following Community Outreach efforts: 1) monthly Ward Meetings conducted in the Targeted Areas, especially the Fifth Ward (Alderman Venita Hervey) and the Third Ward (Alderman Douglas Mark); 2) Brownfield Redevelopment Advisory Committee Meetings, to be held



quarterly; 3) Planning and Development Committee Meetings of the City of Rockford, which are open to the public, published in all the media, and reported upon by the media; 4) the City of Rockford Website, press releases, and legal notices in the local newspapers and 5) monthly coordination meetings with the City's four(4) Brownfield Community Partner Organizations. In addition, \$2,500 in grant funds will be matched with \$5,000 in City funds to prepare Winnebago County Health Department information such as blood lead levels at the Census Tract level and perform statistical analysis of this and other health data at the Census Tract Level. This analysis will be performed by the University Of Illinois College Of Medicine at Rockford.

Grant funds will be used for the printing of handouts and fact sheets, public notices in the local newspaper, and presentation-quality graphic displays to be used at the Ward meetings and other community-related meetings as well as meetings with the Brownfield Community Partners. Although not required under assessment grants, the City will utilize considerable in-kind staff time that will be above normal duties related to community involvement.

#### **Task 6: Programmatic Activities**

As part of the grant process, the City will utilize City staff to prepare all quarterly grant reports and the annual financial reports. We also intend to have City staff attend national Brownfields conferences and workshops including related travel expenses.

#### **Assessment Grant Proposal Budget (Petroleum)**

<b>Budget Categories</b>	<b>Task 1:</b>	<b>Task 2: Phase I ESAs</b>	<b>Task 3: Phase II ESAs</b>	<b>Task 4: Cleanup Planning/ Site Remediation Program</b>	<b>Task 5: Community Involvement and Health Study</b>	<b>Task 6: Program- matic Activities</b>	<b>TOTAL</b>
<b>Personnel</b>							
<b>Travel<sup>1</sup></b>						\$ 3,000	<b>\$ 3,000</b>
<b>Equipment<sup>2</sup></b>							
<b>Supplies</b>					\$ 2,000		<b>\$ 2,000</b>
<b>Contractual<sup>3</sup></b>	\$ 7,500	\$ 27,000	\$100,500	\$ 40,000	\$ 5,000		<b>\$ 180,000</b>
<b>Other: IEPA SRP Fees</b>				\$ 15,000			<b>\$ 15,000</b>
<b>USEPA Grant Total</b>	\$ 7,500	\$ 27,000	\$100,500	\$ 55,000	\$ 7,000	\$ 3,000	<b>\$ 200,000</b>
<b>City In-kind Match Total</b>					\$ 10,000	\$ 5,000	<b>\$ 10,000</b>
<b>Project Total</b>	<b>\$ 7,500</b>	<b>\$ 27,000</b>	<b>\$100,500</b>	<b>\$ 55,000</b>	<b>\$ 17,000</b>	<b>\$ 8,000</b>	<b>\$ 215,000</b>

#### **Task 1: Site Prioritization & Eligibility Determinations**

The City has identified eight Targeted Brownfield Areas as part of this grant application. A listing of the properties in these areas is easily compiled through the use of Winnebago County's GIS information that is fully assessable by City staff. Funds are not needed to identify sites. Our intent is to utilize these grant funds to prioritize the sites. The Brownfields Advisory Committee, which has been dormant for a few years, will be reconstituted to include the Alderman representing each of

these 9 Brownfields Clusters as well as area stakeholders and representative from the neighborhoods. This Committee will provide valuable insight in the prioritization of these sites. Once sites have been prioritized, the eligibility determination information will be gathered and submitted to USEPA for review

**Task 2: Conduct Phase I Site Assessments – Individual Sites**

Once sites are prioritized and eligibility determinations have been completed and accepted, then a Phase I Environmental Site Assessment (ESA) will be conducted. All Phase I ESAs will be prepared in accordance with the ASTM E1527-05 standard, which has been approved by USEPA as demonstrating that All Appropriate Inquiry has been conducted as detailed in the November 1, 2005, 40 CFR 312, Standards and Practices for All Appropriate Inquires, Final Rule, which became effective November 1, 2006. The City anticipates conducting ten (10) to fifteen (15) assessments at an average cost of \$2,500 per site.

**Task 3: Phase II Environmental Site Assessments**

The City anticipates conducting five (5) to seven (7) Phase II ESAs based on the results of the Phase I ESAs. The number of assessments conducted will, in part, depend upon the size of the selected properties and the nature and extent of the contamination involved. The following three (3) items must be prepared by our contracted Brownfields consultant and receive approval from EPA prior to commencing with any Phase II ESA activities: 1) Quality Assurance Project Plan (QAPP), 2) a Health & Safety Plan (HASP), and 3) a Sampling and Analysis Plan (SAP). The Phase II ESAs will be compliant with Illinois EPA Site Remediation Program (SRP) standards. The cost of Phase II ESAs varies widely and tends to be less costly than hazardous substance sites. Costs vary due to the size of the site and the petroleum products being evaluated. As part of the SRP, many petroleum sites are enrolled as “Focused” sites for petroleum indicator contaminants. While laboratory costs can still be significant, the cost is less than the 122 target compound list analysis needed for “Comprehensive” investigations conducted on hazardous substance sites. Overall Phase II ESA costs on petroleum sites can range from \$7,500 to \$45,000 per site.

The sites where contamination is found will then be enrolled into the Illinois EPA SRP. The SRP is a well-tested and proven voluntary cleanup program. Our intent would be to prepare the enrollment application and take the results of the Phase II ESA work and present that information in the form of Work Plan with the application. The Work Plan will detail the additional investigative activities that will be needed to define the lateral and vertical extent of the discovered contamination.

**Task 4: Prepare Remedial Action Plans (Cleanup Plans)**

Following the SRP enrollment (budgeted in this task) and the completion of the Site Investigation step as part of the SRP process, Remedial Objectives Report/Remedial Action Plans (ROR/RAP) will be prepared. We intend to prepare plans for the three (3) to five (5) Phase II ESA properties, based on the amount of funding remaining once we get to this step. This task also includes paying for IEPA project management fees for regulatory review and approval of plans submitted to the IEPA for review under the SRP. The IEPA voluntary cleanup programs are fee-for-service programs. Since all sites for which Phase II ESAs are conducted will be enrolled in the IEPA programs, oversight fees will accumulate beginning with the review of the proposed Phase II Assessment work plan.

**Task 5: Community Involvement**

The objective of this task is to inform the community as a whole and the communities in the Brownfields Targeted Areas of: a) the City’s intent to conduct environmental assessment activities; b) community input concerning the priorities for assessment activities and future redevelopment; c) the assessment results; and d) cleanup plans and redevelopment efforts. The City intends to rely primarily upon the following Community Outreach efforts: 1) monthly Ward Meetings conducted in

the Targeted Areas, especially the Fifth Ward (Alderman Venita Hervey), the Third Ward (Alderman Douglas Mark), and the 13th Ward (Alderman Linda McNeely); 2) Brownfield Redevelopment Advisory Committee Meetings, to be held quarterly; 3) Planning and Development Committee Meetings of the City of Rockford, which are open to the public, published in all the media, and reported upon by the media; and 4) the City of Rockford Web site, press releases, and legal notices in the local newspapers and 5) the monthly meetings with the Brownfield Community Partners.

In addition, \$2,500 in grant funds will be matched with \$5,000 in City funds to prepare Winnebago County Health Department information such as blood lead levels at the Census Tract level and perform statistical analysis of this and other health data at the Census Tract Level. This analysis will be performed by the University Of Illinois College Of Medicine at Rockford.

Grant funds will be also be used for the printing of handouts and fact sheets, public notices in the local newspaper, and presentation quality graphic displays to be used at the Ward meetings, meetings with the Brownfield Community Partners and other community-related meetings. Although not required under assessment grants, the City will utilize considerable in-kind staff time that will be above normal duties related to community involvement.

#### **Task 6: Programmatic Activities**

As part of the grant process, the City will utilize City staff to prepare all quarterly grant reports and the annual financial reports. City staff will also attend national and state Brownfield conferences and workshops. We intend to use grant funds to cover the travel expenses related to attending these conferences and workshops.

ii) Leveraging: The City of Rockford will make every effort to utilize the Illinois EPA River Edge Program to perform Cleanup at sites that have been assessed through the USEPA Assessment Grant Program. This will require the City to enter into Agreements with Developers on the basis of a Cleanup Plan and Draft No Further Remediation letter from Illinois EPA. This will be a serious challenge for the City, considering the low land values and land rents in this region, but the City will make every effort to tap into this resource. A total of \$1.7 Million has been set aside for the City of Rockford once the State of Illinois sells its capital bonds and if the City can find Cooperative Development Partners.

In addition to River Edge, the City has used its TIF Bonding capability effectively in the redevelopment of two Brownfield sites. At the Reed-Chatwood Storage Site, TIF Bonding and a BEDI Grant were used to redevelop a corner of a Brownfield site for construction of new grocery store in 2003. IEPA Assessment Grant funds had been used for ESA work. Last summer, the City of Rockford used its TIF Bonding Authority to leverage \$1.1 million to prepare a portion of the City Yards site for a \$10 million expansion of Liebovich Steel with an 80,000 square foot structure and creation of 10 jobs, initially. This is the first phase of a four phase expansion that will cost \$40 million and produce 40 jobs when complete. Liebovich Steel produces specialty steel components for building construction. Liebovich is landlocked on three sides and was faced with relocation if it could not expand south across Kent Creek into the City Yards property. The City Yards site had been a large J.I. Case manufacturing plant until approximately 1970. The TIF funds were used for assessment, drum removal, tank removal, demolition of several large structures, asbestos abatement, transformer removal and free product removal. Liebovich Steel will also be investing approximately \$200,000 in the reconstruction of the Independence Avenue Bridge over Kent Creek providing access to their expansion area.

The City of Rockford has also made commitments for TIF support of two Brownfield redevelopment projects that are in need of environmental assessment work. The first is the Peacock Brewery Redevelopment where the City has committed up to \$1.5 million in TIF funding for the adaptive reuse of this former brewery to office, restaurants and loft residential condos. The second is the TAPCO building, where a Phase I ESA is being performed and the City will expand Davis Park once this site has been acquired and has had a Phase II ESA. The expansion of Davis Park will be a critical component to a multi-building Brownfield redevelopment effort in the south Downtown that is proposed to yield a downtown hotel, restaurants, offices and residential lofts. The City has made a commitment to use TIF funding to assist in the completion of this project.

**c. Programmatic Capability**

i. Previous USEPA Grants: The Brownfields Coordinator, Wayne Dust, Planning Administrator for the City of Rockford, has 35 years of City Planning experience and has managed several USEPA Grants during the past seven (7) years. During the summer of 2003, the USEPA Brownfields Pilot Grant was successfully closed out and confirmed by correspondence from USEPA. During the fall of 2003, the City of Rockford entered into a Cooperative Agreement with USEPA for two (2) Assessment Grants totaling \$400,000 awarded to Rockford during the 2002-2003 grant cycle. Contracts were awarded to two (2) environmental consulting firms in January of 2004 and these assessment activities were completed during the spring of 2008 with numerous ESAs performed and all funds expended. Significant accomplishments of the 2004 Hazardous Substance Assessment Grant include: 1) partial completion of a Phase II ESA and Remedial Action Plan for the twelve (12) acre Barber Colman industrial complex, and 2) completion of a desktop Phase I for the fifty plus (50+) acre North and South Barber Colman Village Area. For the Petroleum Grant, Phase I ESAs were performed at 7 West State Street Corridor sites and 2 Downtown sites, including the four-block area which was later cleared and is occupied by the new County Justice Center. The Quarterly Reports were prepared by Mr. Dust, submitted to USEPA, and approved on a regular basis. The FY 2004 Assessment Grants had been extended to September 30, 2008 and was closed out in 2008.

During the fall of 2005, the City of Rockford entered into a Cooperative Agreement with USEPA concerning two (2) Assessment Grants totaling \$400,000 awarded to Rockford during the 2004-2005 grant cycle. Contracts were awarded to three (3) Environmental Consulting firms during February of 2006 and this Assessment Grant was completed in the summer of 2008, with all funds expended. Major additional Phase II ESA work was performed at the City-owned Barber Colman sites. Phase I and Phase II ESAs were completed for the City-owned former Ingersoll site, a 5 Acre site on the bank of the Rock River. This site was then enrolled in the IEPA Site Remediation Program. Phase I ESAs were also performed on Keith Creek Greenway sites prior to City acquisition. For the Petroleum Grant, several additional Phase I ESAs and one Phase II ESA were performed in the West State and Downtown areas. Quarterly reports have been submitted by Mr. Dust, and approved on an ongoing basis for these Grants. The FY 2006 Assessment Grants had been extended to September 30 of 2008 and was closed out in 2008.

The City of Rockford received a \$400,000 Community Wide Assessment Grant for the FY 2008 period. This grant has been used to complete Phase II ESA work at the Barber Colman Complex (Hazardous Substances) and for Phase I and Phase II ESA work at several Downtown Sites. This Grant is now 98 % completed and the remaining funds in this grant are committed to the Phase I at the Tapco site. Three Cleanup Grants were received in 2008, Asbestos Removal contracts were awarded and are 95% complete and the Grant is 80% complete.

The City of Rockford also received a Brownfields Revolving Loan Fund Award of \$500,000 in 2000. Under Mr. Dust's supervision, this Revolving Loan was used to Cleanup the Invensys Metal Plating site at Barber Colman, during 2005, to be used as a future section of the Riverfront Greenway along the Rock River. The Revolving Loan Fund Grant has been completed, with all funds expended, and closed out. This was confirmed by correspondence from USEPA. The City is taking steps to revolve these funds through legal action against the former property owner. In addition, two (2) Illinois EPA Assessment Grants totaling 240,000 were awarded, completed, and closed out during the 2001 through 2004 time period. These assessment efforts, together with the City's acquisition and clearing of a mixed industrial and commercial site, culminated in the receipt of the No Further Remediation letter from the Illinois EPA for the five (5) acre site acquired by the City of Rockford for the New Federal Courthouse, a \$100 million project which is now under construction by US General Services Administration and nearing completion.

There was only one (1) minor adverse finding from the July 26, 2006 OMB Circular A-133 Audit performed by Mc Gladrey and Pullen for 2005. Finding 2005-7 stated that..."the City is required to submit quarterly reports to the U.S. EPA within 30 days after the end of each quarter that details expenditures and other activities under the programs, as well as progress being made at the clean-up sites. We noted that out of eight quarterly reports that should have been filed for the year ended December 31, 2005, six of the reports were late... The Cause stated "Delays in submitting the quarterly reports have been due to delays in receiving billings from the five Environmental Consulting firms under contract to perform the environmental work for the City. Section 2.2 of the required quarterly report by USEPA requires documentation of the "Funds Expended" during the reporting period". The Management's Response by the City stated..."If necessary, we are prepared to send an incomplete report to meet the USEPA Cooperative Agreement deadline to be followed by a final report when we have received all of the information". It should be noted that all quarterly reports due starting July 30 2006 through the present have been submitted on time with the exception of two reports submitted one day late.

During the past seven years, the Rockford Brownfields Coordinator has made every effort to comply with the Cooperative Agreement and quarterly progress report requirements for the Assessment Grants, BCRLF and, more recently, the three (3) Cleanup Grants. The Brownfield Pilot Grant and Assessment Grants have been instrumental in preparing two (2) sites for major governmental facility construction projects. Assessment Grants have been used to perform Phase I and Phase II ESAs Environmental Assessments at the 15acre City-owned Barber Colman complex in preparation of this site for redevelopment. Letters of No Further Remediation have been received on a portion of the area comprising approximately one-third of the site.

### 3. Community Engagement and Partnerships

**a. Plan for involving the affected community:** Rockford understands the importance of involving the community in Brownfield redevelopment. The City of Rockford has been actively involved in the community in its Brownfield initiatives. Wayne Dust, local Brownfield Coordinator and Planning Administrator for the City of Rockford, has presented an overview of the City's intent to apply for USEPA Brownfield Assessment and Cleanup Grants at several of the Fifth Ward meetings at the Montague Branch Library. He has regularly presented at these meeting throughout the last three years, informing the community of assessment and cleanup work as well as the the grant application process. It is important to note that the Public Hearing

for the asbestos removal at the Rock Street Frontage, River Street Frontage and Machine Shop Sites at the Barber Colman Complex was held at the Montague Branch Library on April 24, 2008 and Alderman Bell's Monthly Fifth Ward Meeting immediately followed the close of the public hearing. The people of the Fifth Ward have been kept well informed over the past several years of the City's efforts to redevelop numerous Brownfield sites and have been very supportive of the City's efforts. Five (5) of the nine Targeted Brownfield Clusters proposed for this grant are located in the Fifth Ward. Mr. Dust will continue to provide status reports and seek input from the community at these Fifth Ward Meetings and the present Alderman, Ms. Venita Hervey.

In addition to the efforts in the Fifth Ward, the Brownfields Coordinator has worked with Third Ward Alderman Douglass Mark on initial steps to inform the property owners of the North Madison Street Targeted Cluster of the City's intent to redevelop this industrial area along the Rock River to retail and residential with a public pathway/ greenway along the Rock River. During May of 2006, all property owners were notified of the City's intent to rezone the area from industrial to C-4 Commercial Downtown (mixed use). A Public Hearing was conducted as part of this rezoning process, and the rezoning was approved by City Council on November 6, 2006. Alderman Mark will hold Ward meetings to inform the property owners and surrounding residents of the status of redevelopment proposals and environmental assessment work. It should also be noted that the Third Ward includes three (3) of the Targeted Clusters: North Madison Street, as previously noted, Ingersoll/ Watch Factory and Downtown. Mr. Dust will also work with Thirteenth Ward Alderman Linda Mc Neely and Sixth Ward Alderman Lenny Jacobson concerning potential assessment activities in their Wards, especially in conjunction with redevelopment efforts stemming from recently created TIF Districts in these Wards. The Ward Meetings conducted by these Aldermen will be used as a venue to inform these communities of these programs and identify potential redevelopment projects. These Wards contain portions of 3 of the 9 Brownfield Clusters

**b. Identification and establishment of state and local partners:** Although the City of Rockford had been awarded two Illinois EPA (IEPA) Brownfield Assessment Grants some time ago, the more recent designation of the City of Rockford River Edge Zone has created a major new opportunity to partner with IEPA on redevelopment projects on Brownfields sites requiring cleanups. The IEPA funds are severely restricted and do not include cleanup other than soil and groundwater. Combined with USEPA programs, however, the City will strive to tap into this valuable resource to accomplish the redevelopment of Brownfield sites. Mr. Dust has met with Mr. Doug Scott, IEPA Director concerning this new program.

The City is actively developing partnerships for redevelopment projects at the local, state, and federal levels. The City developed a Master Plan with the assistance of the Rockford Local Development Corporation (RLDC) for the Barber Colman Village area and is continuing discussions with potential developers. Working with the RLDC, a portion of the former Barber Colman facility was redeveloped, following assessment and cleanup, as a new grocery store, serving the surrounding area. Also the City has partnered with Winnebago the development of the \$100 County Justice Center (completed) and with the U.S. General Service Administration for the development of the \$100 million Federal Courthouse. Following assessment, acquisition, demolition and cleanup activities the Federal Courthouse is now under construction and is expected to be completed in early 2010.

The City plans to develop additional partnerships to successfully accomplish sustainable development at each of the targeted areas. The Ingersoll /Watch Factory Cluster, located on the

east bank of the Rock River in the Third Ward, is planned to become a Whitewater Park (kayaking and rafting). To accomplish this will require a partnership between the City, who owns half of the proposed site, Commonwealth Edison, who owns the other half of the site and the dam needed for this project, the Winnebago County Health Department located adjacent to the ComEd site and the Illinois Department of Natural Resources who has interest in modifying the dam to become a fish passage as well as serving the proposed Whitewater Park. The City of Rockford has hired HNTB to determine the structural integrity of the dam and the feasibility of re-watering the former hydro-electric plant water race. This \$187,000 investment by the City demonstrates the City's commitment to this project. The Rockford Park District is anticipated to own and operate the Whitewater Park when completed. Brownfield issues at this site include a former coal-fired powered generating plant, former hydro-electric plant, two (2) former foundries, a former transformer storage yard, and underground petroleum storage tanks. The USEPA could be a possible partner in this site for time critical removal actions similar to the Sparkle Cleaners site in Rockford during February of 2008

Successful redevelopment efforts at all of the targeted areas will require partnership with the Rockford Park District because of the plan for Pathways and Greenway corridors through each of the targeted areas and the future stewardship provided by the Park District. Also, the River District Association is actively involved in promoting the successful redevelopment of all of these areas because all of these areas will positively affect Downtown if successfully redeveloped.

**c. Description of and role of the key community-based organizations**

- i. The River District Association is a private, 501 (c) 3 not-for-profit membership based organization with over 500 members. The Association's mission is to promote a growing, thriving, prosperous business and residential community in Rockford's Downtown neighborhood, the River District. The River District Board and Executive Director have met monthly with the City Administration and Community and Economic Development Department Staff including the City's Brownfield Coordinator, Wayne Dust, concerning Downtown Redevelopment selection and prioritization of Brownfield sites. Brownfield initiatives at important Downtown sites have been priority items on these monthly agendas. The River District plays an important role in marketing and promoting redevelopment of the City's Brownfield sites in its weekly newsletter, "River District E-Newsletter" The representative from the River District is Kim Wheeler, Executive Director. Ms. Wheeler may be reached at 815.964.6221.
- ii. The Rockford Local Development Corporation (RLDC) is a not-for-profit certified development company, by the Small Business Administration, that strives to be a champion for small business and economic development. RLDC has frequently been a Development Partner with the City, including the development of the Gray's IGA Store on South Main Street on a former Brownfield site and the Brownfields Cleanup at the former Invensys site. The RLDC recently partnered with the City of Rockford in the redevelopment of a portion of the Reed-Chatwood Storage Site for additional development of a medical clinic and general merchandise store. RLDC has also partnered with the City in the City's program to relocate families from the flood impacted Keith Creek floodway, an area where over 100 homes were severely damaged by two severe floods in less than one year's time. RLDC has acquired over 100 properties for the City. Mr. John Phelps is the Executive Director of the RLDC. Phone: 815.987.8675
- iii. Comprehensive Community Solutions, Inc. (CCS) is a not-for-profit agency that provides job training, builds affordable housing and works to redevelop economically

distressed neighborhoods in the City, including near the West State Street Corridor. The CCS YouthBuild program allows troubled youths the opportunity to develop their vocational skills on redevelopment projects. CCS has been a Development Partner with the City and partnered with the City on several housing construction and community development projects in several areas of the City. In the future, the City will partner with CCS in the recycling of building construction materials from deconstruction sites. The Executive Director/CEO is Kerry Knodle, 815.963.6236.

iv. Rockford Area Economic Development Council (RAEDC) as the regional economic development council, partners with the City of Rockford and the other local governments in this region in its primary role, “to help employers retain and create quality jobs”. This partnership fits well with the RAEDC’s four public policy priorities, especially the priority of a “Coordinated Regional Economic Development Plan”, a plan that results in the area being prepared for economic development. The RAEDC can help the City promote the redevelopment its Brownfield sites when they have been prepared for redevelopment. City staff of the Community and Economic Development Department meets weekly to review current issues and opportunities. The Brownfields Coordinator is included in specific meetings for certain issues. Ms. Janyce Fadden is the President of the RAEDC and her contact number is 815.987.8118

In addition to the community organization listed above, the City of Rockford frequently partners with the Rockford Park District for the development of Greenways and pathways on Brownfield sites. The Rockford Park District is a separate regional taxing district with an elected governing board. The Director of the Rockford Park District is Tim Dimke, 815.987.8800.

#### 4. Project Benefits

**a. Welfare and Public Health:** The nine Targeted Brownfield Clusters all have Rock River, Kent Creek or Keith Creek within the Area, all are located in proximity to Downtown, and all incorporate the City of Rockford and Rockford Park Districts plans for a continuous system of Greenways and Pathways along the Rock River and major creeks while linking with the major regional pathway system including the Grand Illinois Trail. Each of these Targeted areas has redevelopment plans that include job creation or major commercial and residential developments that focus on walking, non-motorized transportation, and in bad weather, public transportation, as the primary means of transportation to work or for recreation. This focus on creating several development nodes that encourage non- motorized transportation as part of this lifestyle is an important means of preventing pollution and promoting personal health. In addition, the Greenways Plan includes converting one of the three (3) railroad trestles across the Rock River to a pedestrian bridge linking the recreation paths on either side of the river that will be located within the Targeted Areas.

**b. Economic Benefits and/or Green space**

i) Economic Benefits: This important goal will be accomplished by the City efforts in the nine (9) Targeted Clusters. Without the City’s concern for the redevelopment of Brownfields within the Rock River Corridor and the USEPA programs to assist with these redevelopment efforts, there is considerable evidence that Brownfield Areas would simply expand and intensify over time as more and more industrial buildings approach the end of



their useful life. Instead, many buildings along the Rock River Corridor have been acquired by the City or other public or private entities that have been working with the City of Rockford towards the phased redevelopment of these areas. In the case of the Ingersoll/Watch Factory Cluster, for example, efforts to prevent Brownfields include the plan to include the underutilized and largely-vacant watch factory, the vacant Commonwealth Edison site, previously described, and the Ingersoll facility, which had manufactured many different products over the years. It is the City's intent to relocate the tenant at the Watch factory to an appropriately sized facility as the watch factory is redeveloped to mixed office and residential uses that would compliment the Whitewater Park and public open space at the Ingersoll and Com Ed site. Similar comprehensive plans are in place or being developed at all of the 9 Targeted Brownfield Clusters. All these plans include adaptive reuse or redevelopment of these areas to replace Brownfield properties with residences, retailers, offices, and public destination points, all of which contribute to the tax base as these areas are revitalized. All include retail services for the surrounding community job creation. Prevention of Brownfields and preventing existing Brownfields from expanding or intensifying is extremely important to surrounding neighborhoods, which, as demonstrated in Section 1, are already economically disadvantaged.

ii) Other non-economic benefits for sites to be used for green space: The City's primary non-economic benefit goal within the nine (9) Targeted Brownfield Clusters is to provide adaptive reuse and/or redevelopment of these areas to include a major public open space component consistent with the Rockford Park District's Greenway Plan for a continuous recreational path greenway corridor along both sides of the Rock River with city parks, boat launches and other major facilities at various points within the system and designed to compliment the City's redevelopment efforts. This goal is integrated with the economic development goals because public access to the riverfront will be restored even though adjacent property will be restored to private ownership and the tax base. The restoration of the public access benefits the desirability of the area as a place to live work and play. Each of the nine (9) Targeted Clusters includes publicly owned properties and privately-owned properties where there is cooperation with the City. These properties will provide the starting point for the redevelopment efforts which will expand to encompass the full targeted area over time. Each Targeted Cluster has different potential. The Ingersoll /Watch Factory Cluster for example, has potential for enhanced property values and economic benefits due to increased tourism activity, restaurants, and other retailers and additional landscaped public open space. Rockford is committed to including Green space and open space in urban redevelopment strategies for Brownfields sites. The 2020 Plan for Rockford places an emphasis on smart growth techniques, which includes preserving the Green space that is available to the City and preventing the consumption of land on the City's fringe. Protecting and preserving the Rock River Corridor also provides a major amenity to the redevelopment taking place in these same Brownfield areas.

A high priority for the City is the redevelopment along the Rock River. Recreational use along the Rock River is consistent with the River District Framework Plan as well as the Rockford Park District Plan for continuous recreational paths along both sides of the Rock River. Davis Park is an existing park along the west bank of the Rock River and serves as an anchor to the south end of Rockford's Downtown. To the south are three (3) additional Targeted Areas: South Main Street/ Water Power District, Barber Colman Village North and the Barber Colman complex. Successful creation of the Greenways as planned would provide: a) a continuous Pathway from Davis Park south for two miles; b) a pathway

connecting with the Davis-Pec Prairie Path and serving as a section of the Grand Illinois Trail; c) planned public Fishing Parks near the dam and where Kent Creek enters the Rock River and d) a major access point to the trail system at an expanded South Park. It is important to note that a large number of the Brownfields sites in these Targeted Areas are located within the 100 year flood plain of the Rock River or in the floodway. The removal of certain structures will, in some cases, require the reestablishment of the flood plain.

**c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse:** Each of these important goals will be incorporated into our redevelopment efforts with the Rockford Park District. A major component of the infrastructure reuse will be the improved public access to the Rock River, which is an important part of the City's infrastructure as it is legally designated as a public right-of-way. All public utilities in these Targeted Brownfield Clusters will be better utilized with redevelopment. Native landscaping will be restored as the greenway system paralleling the Rock River is completed. Also, the Whitewater Park, proposed to utilize existing Commonwealth Edison (COMED) and City of Rockford property on the Rock River, includes a fish passage through the existing COMED dam, restoring native fish upstream. The City and Rockford Park District would have several opportunities to develop storm water management and reuse innovations, especially the ability to incorporate water quality improvements and water features into the Rock River Corridor Greenway program. Some of the best opportunities for these innovations will be at riverfront locations where large industrial structures have been removed or will be removed as part of the redevelopment efforts. The majority of these riverfront factories were built on fill from demolition of previous structures giving the City the opportunity to address both storm water and debris/fill issues.

**d. Plan for Tracking and Measuring Progress:** We understand the importance of identifying the outcomes and outputs for our Brownfields Program. Agencies that award federal grants funds require the reporting of these outcomes and outputs to help justify the use of their funds and to secure the future of their funding programs. We will demonstrate to U.S. EPA the important outcomes and outputs of our Brownfield Project by regularly updating the ACRES System for each site that is targeted for assessment. We will specifically identify the following:

Outcomes of Assessment Grant Funding:

- Acreage of land in which environmental threats have been characterized
- Acreage of land positioned for reuse
- Jobs leveraged
- Funding leveraged
- Acreage of green space created or preserved

Outputs of Assessment Grant Funding:

- Phase I Environmental Site Assessments at twenty (20) to twenty-seven (27) sites.
- Phase II Environmental Site Assessments at eight (8) to twelve (12) sites (will vary depending on outcome of Phase I ESAs). Phase II Environmental Site Assessments will sample for the Illinois EPA Target Compound List (TCL) that includes volatile organic compounds, semi-volatile organic compounds, metals, pesticides, and PCB's all to position the site for enrollment in the SRP if contamination is discovered. While the TCL laboratory work is expensive, it allows a site to be enrolled into the SRP as a "Comprehensive" site.
- Enrollment of six (6) to ten (10) sites into the Illinois Environmental Protection Agency's SRP as "Comprehensive" sites, providing the greatest degree of protection.